

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUMAN RIGHTS DEFENSE CENTER, a
Washington nonprofit corporation,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE; and its component, DRUG
ENFORCEMENT ADMINISTRATION,

Defendants.

Case No. 2:20-cv-00674-JHC

PARTIES' FOURTH STIPULATED
MOTION TO EXTEND FILING DEADLINE
FOR PLAINTIFF'S MOTION FOR FEES
AND COSTS & ORDER

STIPULATED MOTION

Pursuant to Local Civil Rule 7(j) and 10(g), Plaintiff Human Rights Defense Center ("Plaintiff") and Defendants Department of Justice and Drug Enforcement Administration (collectively, "Defendants") move the Court for an order extending the time by which Plaintiff must file its motion for attorneys' fees and costs. Specifically, the Parties request an additional 30-day extension of the F.R.C.P. 54(d)(2)(B)(i) deadline as follows:

Deadline	Current Date	Revised Date
Motion for Fees and Costs	October 23, 2024	November 22, 2024

The parties have finalized a settlement agreement on Plaintiff's fees for this matter, and are currently awaiting confirmation and processing of payment. Therefore, good cause

exists to extend this deadline because the parties have reached a resolution, which obviates the need for expenditure of further litigant and judicial resources. Good cause also exists because there is no prejudice towards any party. Accordingly, the Parties respectfully request the Court grant this Motion.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

I certify that this paper contains 158 words, in compliance with Local Civil Rule 7(e)(1).

DATED this 22nd day of October, 2024.

TESSA M. GORMAN
United States Attorney

DAVIS WRIGHT TREMAINE LLP

By s/ Kyle Forsyth
KYLE FORSYTH, WSBA #34609
Assistant United States Attorney
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Tel: 206-553-7970
Fax: 206-553-2422
Email: kyle.forsyth@usdoj.gov

By s/ Caesar Kalinowski IV
Eric M. Stahl, WSBA #27619
Caesar Kalinowski IV, WSBA #52650
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, WA 98104
Tel: 206-622-3150
Fax: 206-757-7700
Email: ericstahl@dwt.com
caesarkalinowski@dwt.com


Attorney for Federal Defendants

Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

Dated this 23rd day of October, 2024.



JOHN H. CHUN
United States District Judge